

# **EXHIBIT C**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

**Hon. Matthew F. Kennelly**

**JOINT DECLARATION OF SETTLEMENT CLASS COUNSEL'S NOTICE OF SUPPLEMENTAL AUTHORITY AND SUPPLEMENTAL MEMORANDUM OF LAW SUPPORTING THEIR MOTION FOR SERVICE AWARDS, REIMBURSEMENT OF EXPENSES, AND ATTORNEYS' FEES IN LIGHT OF RECENT AUTHORITY**

In support of Plaintiffs' Supplemental Memorandum of Law Supporting Their Motion for Service Awards, Reimbursement of Expenses, and Attorneys' Fees filed pursuant to the Court's Order dated February 28, 2024 (ECF No. 638), and under 28 U.S.C. § 1746, we declare:

1. We are partners or shareholders of the law firms Freedman Normand Friedland LLP ("FNF"), Gilbert Litigators & Counselors, PC ("GLC"), and Berger Montague PC ("BMPC"). The Court approved ourselves and our firms as Settlement Class Counsel, ECF No. 638 at 6 ¶ 6, for the provisionally certified Class for purposes of the Settlements at issue. *See id.* at 5 ¶ 3 (defining Settlement Class).

2. We have been involved in developing, prosecuting, overseeing, and resolving this Action, are familiar with its proceedings, and have personal knowledge of the matters set forth herein. If called upon and sworn as witnesses, each of us would be competent to testify thereto.

3. In other antitrust class actions, to the best of our knowledge over the last twenty years (the period of time for which Mr. Cramer can reasonably determine what arrangements his colleagues have negotiated in such cases), Settlement Class Counsel have not entered into alternative fee structures involving relatively lower percentages of recovery as the settlement amount increased; and have not made any bids for modified fee structures involving a lower percentage of recovery than one-third of the recovery. In addition, Settlement Class Counsel have not agreed with any Class Representative in this case to accept less than the one-third of the gross settlement amount, plus interest, that Settlement Class Counsel seek here.

### **CONCLUSION**

4. Settlement Class Counsel respectfully submit, for the reasons set forth above, in their accompanying supplemental memorandum of law, and in their previously submitted memorandum of law, that the record and law amply support their attorneys' fee application.

I certify under penalty of perjury that the foregoing is true and correct. Executed on July 9, 2024, in Middlesex, New York.

/s/ Edward Normand  
Edward Normand  
**FREEDMAN NORMAND**  
**FRIEDLAND LLP**  
155 E. 44<sup>th</sup> Street, Suite 905  
New York, NY 10017  
Tel: (646) 350-0527  
tnormand@fnf.law

I certify under penalty of perjury that the foregoing is true and correct. Executed on July 9, 2024, in Hermosa Beach, California.

/s/ Robert Gilbert  
Robert Gilbert  
**GILBERT LITIGATORS**  
**& COUNSELORS**  
11 Broadway, Suite 615  
New York, NY 10004  
Tel: (646) 448-5269  
rgilbert@gilbertlitigators.com

I certify under penalty of perjury that the foregoing is true and correct. Executed on July 9, 2024, in Philadelphia, Pennsylvania.

/s/ Eric L. Cramer  
Eric L. Cramer  
**BERGER MONTAGUE PC**  
1818 Market Street, Suite 3600  
Philadelphia, PA 19106  
Tel: (215) 875-3000  
ecramer@bm.net